

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Telephone Number Portability	)	WCB Docket No. 95-116
Petition of IT&E Overseas, Inc.	)	
To Extend the Date for Implementation	)	
Of Wireless-to-Wireless Local Number	)	
Portability on Guam	)	

To: Chief, Wireless Telecommunications Bureau

**PETITION OF IT&E OVERSEAS, INC.  
TO EXTEND THE DATE FOR IMPLEMENTATION  
OF WIRELESS-TO-WIRELESS LNP ON GUAM**

IT&E Overseas, Inc. ("IT&E") hereby petitions the Chief of the Wireless Telecommunications Bureau pursuant to Rule 52.31 of the Commission's Rules (47 C.F.R. § 52.31) to extend the date for LNP implementation for IT&E's wireless switch on Guam from October 15, 2005, until February 15, 2006. In support of its Petition IT&E demonstrates as follows:

1. On April 6, 2005, IT&E received a Bona Fide Request ("BFR") form from Guam Cellular & Paging, Inc. dba Guamcell Communications ("Guamcell"). Guamcell's BFR sought the implementation of wireless LNP by October 15, 2005.
2. As is relevant here, IT&E is a CMRS provider by virtue of certain PCS frequencies which it utilizes within the Guam MTA.
3. IT&E has taken steps to make its switch LNP capable. However, as part of the LNP implementation process, IT&E has engaged Verisign as its network LNP database provider.

4. Verisign has advised IT&E that it must test before it is able to be operational for IT&E in the Guam market. Because certain wireline and wireless affiliates of TeleGuam Holdings, LLC ("GTA") have indicated that they will miss an earlier scheduled LNP implementation date for the Guam market, Verisign has been unable to engage in the required testing.<sup>1</sup>

5. As the Commission may know, all CMRS carriers on the island of Guam connect with each other through the tandem facilities of GTA's wireline telephone operations. This makes it particularly important that GTA be able to support LNP testing and implementation in order for the process to occur.

6. GTA's own Petition seeks a waiver of LNP implementation until December 15, 2005, and indicates that it expects testing to have been completed with the other wireless carriers by November 30, 2005.

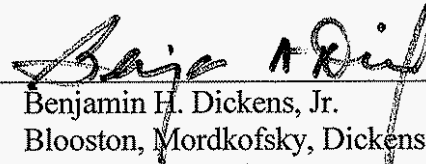
7. IT&E respectfully submits that February 15, 2006 should be the new date for LNP implementation under the Guamcell BFR. As discussed earlier, the implementation of LNP by the wireless carriers serving Guam is a process interlinked among the carriers, including GTA. The margin for error is great if GTA slips again, given the holiday period's impact on personnel from all quarters, including vendors and carriers. It is IT&E's understanding that Guamcell does not object to the postponement of this date for LNP implementation by IT&E. IT&E will supplement this petition with

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<sup>1</sup> Facts relating to GTA's own BFR, and inability to implement on the date that it had sought from wireless carriers, such as IT&E, are contained in the Petition of TeleGuam Holdings, LLC To Extend The Date For Implementation Of Wireless-to-Wireless LNP On Guam. As of this date, it appears that a Public Notice has not yet been issued on GTA's Petition.

milestone dates for testing and implementation, as soon as it is able to coordinate such with GTA, a process it has been unable to accomplish to date.

Respectfully submitted,

By:   
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Counsel for IT&E Overseas, Inc.

Dated: August 16, 2005

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2005 I have served the foregoing pleading via electronic mail on the following persons:

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
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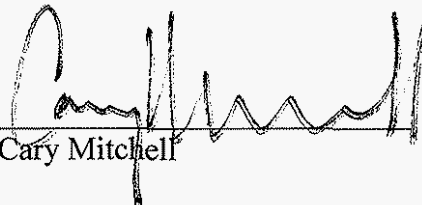
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